

**COMMENTS IN SUPPORT OF RM-11136**

The firm of Munn-Reese, Inc., Broadcast Engineering Consultants, is filing comments in support of RM-11136, Amendment of Section 73.21 and 73.37, of the Commission's Rules to Provide for Facilities Changes by Stations Operating in The Expanded AM Band (1605-1705 kHz).

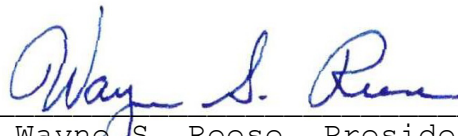
Existing AM expanded band stations are definitely operating at a competitive disadvantage to their sister stations in the band from 535-1605 kHz. Allowing these stations the opportunity to operate as full Class B stations with operating power up to 50 kW and use of directional antenna systems, would help alleviate this problem, especially during nighttime hours of operation.

It also makes sense to go to a contour based allocations procedure for the expanded AM band. The original allocation of expanded band allotments was created on a spacings basis. A spacing allocation of stations provides very inefficient use of the spectrum. It seems that transitioning to Class B status for expanded band allotments would be the first step to standardizing the allotment of future stations in this band.

The expanded band was not created for just the original expanded band allotments. It is now time to allow applicants for new and existing stations to be able to migrate to the expanded band. Changes made in the allocation procedures in 1992 have provided much more protection to existing facilities. If those allocation procedures were adequate in minimizing interference for the present 535-1605 kHz band, then they should be applicable to the expanded band. Opening the expanded band would especially provide new spectrum for minority broadcasters who have been clamoring for operations that cover larger populations than spectrum options like Low Power FM (LPFM).

February 4, 2005

By

A handwritten signature in blue ink, reading "Wayne S. Reese".

Wayne S. Reese, President  
Munn-Reese, Inc.